

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATIONS OF
UNIVERSITY PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT OF
STATE, ET AL.,

Defendants.

No. 1:25-cv-10685-WGY

**DEFENDANTS' OPPOSED MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO THE MOTIONS TO INTERVENE AND TO UNSEAL PLEADINGS AND EXHIBITS**

Defendants, by and through their counsel, respectfully move this Court to extend the time to respond to the multiple motions to intervene by parties who seek to unseal select pleadings and trial exhibits. *See* Dkts. # 266, 267, 275, 276. Pursuant to Local Rule 7.1(b)(2), Defendants' response to these motions is currently due by Friday, November 28, 2025. The motions were filed during the recent lapse in appropriations, during which Department of Justice attorneys and some employees of the Defendant agencies were prohibited from working, even on a voluntary basis, except in very limited circumstances. Appropriations were restored at the end of the day on November 12, 2025. On reopening, Defendant agencies and counsel have been addressing numerous concurrently-activated deadlines. Additionally, responding to the instant motions requesting to unseal certain documents necessitates careful review and coordination by counsel and Defendant agencies to determine which documents may be unsealed, and to set forth the reasons regarding those that may not. In short, due to reopening-related demands, and Thanksgiving holiday work-flow disruptions, Defendants respectfully request an additional 14 business days, until December 12, 2025, in which to submit their response. Counsel for Plaintiffs have indicated that they oppose this extension request.

Respectfully Submitted,

BRETT A. SHUMATE
Assistant Attorney General

DREW C. ENSIGN
Deputy Assistant Attorney General

Ethan B. Kanter
ETHAN B. KANTER
Chief, National Security Unit
Office of Immigration Litigation
P.O. Box 878, Ben Franklin Station
Washington, D.C. 20001

PAUL F. STONE
Deputy Chief, National Security Unit
Office of Immigration Litigation

WILLIAM G. KANELIS
Civil Division

Dated: November 26, 2025

Counsel for Defendants

L.R. 7.1(a)(2) CERTIFICATION

I, Ethan B. Kanter, hereby certify that Government counsel conferred with Plaintiffs' counsel regarding this motion on November 26, 2025.

Date: November 26, 2025

By: /s/ Ethan B. Kanter
ETHAN B. KANTER
U.S. Department of Justice

CERTIFICATE OF SERVICE

I, Ethan B. Kanter, hereby certify that on November 26, 2025, I served this document upon all registered parties via the ECF Notice of Electronic Filing (NEF) system.

Date: November 26, 2025

By: /s/ Ethan B. Kanter
ETHAN B. KANTER
U.S. Department of Justice